

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ASHOT EGIAZARYAN

v.

PETER ZALMAYEV

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No. 1:11-cv-02670 (PKC) (GWG)

DECLARATION OF JAMES P. GOLDEN

JAMES P. GOLDEN declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am Peter Zalmayev's lawyer, and I submit this declaration in support of Mr. Zalmayev's opposition to Ashot Egiazaryan's objections and motion to set aside Magistrate Judge Gorenstein's order authorizing limited access to Mr. Egiazaryan's asylum application.

2. Attached as exhibit 1 is a true and correct copy the transcript of the proceedings before Magistrate Judge Gorenstein on November 8, 2011.

3. Exhibits 2, 3 and 6-8, attached, are portions of the record that was before Magistrate Judge Gorenstein during his consideration of Mr. Egiazaryan's application for a protective order concerning his asylum application. Exhibits 4-5 are two Associated Press articles that are exhibits to other

motions in this case. Exhibit 9 is excerpts of the deposition of Jeffery H. Birnbaum that were referred to during the argument before Magistrate Judge Gorenstein on November 8, 2011.

4. Exhibit 2 is a true and correct copy of pages 1 and 15 of "Peter Zalmayev's Request For Documents Directed To Ashot Egiazaryan" served July 18, 2011.

5. Exhibit 3 is a true and correct copy of Mr. Egiazaryan's Initial Disclosures dated July 8, 2011.

6. Exhibit 4 is a true and correct copy of Douglas Birch's February 6, 2011, article: "Fearful Russian lawmaker flees to US."

7. Exhibit 5 is a true and correct copy of Douglas Birch's March 9, 2011, article: "Fugitive lawmaker denounces Russian vote."

8. Exhibit 6 is a true and correct copy of Douglas Birch's May 27, 2011, article: "Story of Russian tycoon in Beverly Hills made for Hollywood."

9. Exhibit 7 is a true and correct copy of Ashot Egiazaryan's October 17, 2011, commentary in *The Wall Street Journal*: "Can Russia Ever Change?"

10. Exhibit 8 is a true and correct copy of the March 14, 2011, letter agreement between BGR Gadara, Ltd. and Gibson Dunn Crutcher, LLP, on behalf of Ashot Egiazaryan.

11. Exhibit 9 is true and correct copies of pages 1, 31, 65 and 66 of the transcript of the September 28, 2011, deposition of Jeffery H. Birnbaum.

/s/ James P. Golden
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Dated: December 6, 2011